

Mark C. Mao, CA Bar No. 236165  
 Beko Reblitz-Richardson, CA Bar No. 238027  
 Erika Nyborg-Burch (admitted *pro hac vice*)  
**BOIES SCHILLER FLEXNER LLP**  
 44 Montgomery St., 41st Floor  
 San Francisco, CA 94104  
 Tel.: (415) 293-6800  
 mmao@bsflfp.com  
 brichardson@bsflfp.com  
 enyborg-burch@bsflfp.com

James Lee (admitted *pro hac vice*)  
 Rossana Baeza (admitted *pro hac vice*)  
**BOIES SCHILLER FLEXNER LLP**  
 100 SE 2nd St., 28th Floor  
 Miami, FL 33131  
 Tel.: (305) 539-8400  
 jlee@bsflfp.com  
 rbaeza@bsflfp.com

Amanda K. Bonn, CA Bar No. 270891  
**SUSMAN GODFREY L.L.P.**  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel: (310) 789-3100  
 Fax: (310) 789-3150  
 abonn@susmangodfrey.com

*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

CHASOM BROWN, WILLIAM BYATT,  
 JEREMY DAVIS, CHRISTOPHER  
 CASTILLO, and MONIQUE TRUJILLO  
 individually and on behalf of all similarly  
 situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

William Christopher Carmody  
 (admitted *pro hac vice*)  
 Shawn J. Rabin (admitted *pro hac vice*)  
 Steven M. Shepard (admitted *pro hac vice*)  
 Alexander Frawley (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P.**  
 1301 Avenue of the Americas,  
 32<sup>nd</sup> Floor  
 New York, NY 10019  
 Tel.: (212) 336-8330  
 bcarmody@susmangodfrey.com  
 srabin@susmangodfrey.com  
 ssh Shepard@susmangodfrey.com  
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)  
 Ryan J. McGee (admitted *pro hac vice*)  
**MORGAN & MORGAN**  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel.: (813) 223-5505  
 jyanchunis@forthepeople.com  
 mram@forthepeople.com  
 rmcgee@forthepeople.com

Michael F. Ram, CA Bar No. 104805  
**MORGAN & MORGAN**  
 711 Van Ness Ave, Suite 500  
 San Francisco, CA 94102  
 Tel: (415) 358-6913  
 mram@forthepeople.com

Case No.: 4:20-cv-03664-YGR-SVK

**DECLARATION OF MARK C. MAO IN  
 SUPPORT OF PLAINTIFFS'  
 OBJECTIONS TO THE SPECIAL  
 MASTER'S RECOMMENDED  
 PRESERVATION PLAN**

Referral: The Honorable Susan van Keulen

**DECLARATION OF MARK C. MAO**

I, Mark C. Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. I submit this Declaration in support of Plaintiffs' Objections to the Special Master's Recommended Preservation Plan.

3. Attached hereto as **Exhibit 1** are excerpts from the March 18, 2022 deposition of Google employee and designated Rule 30(b)(6) witness Dr. Glenn Berntson.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 15th day of April, 2022, at San Francisco, California.

/s/ Mark Mao